

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re: Methyl Tertiary Butyl Ether ("MTBE")
Products Liability Litigation**

This Document Relates To:

**Master File No. 1:00-1898
MDL No. 1358 (SAS)
M21-88**

*Orange County Water District v. Unocal Corp.,
et al.*
Case No. 04 Civ. 4968 (SAS)

**DECLARATION OF PAMELA R. HANE BUTT IN SUPPORT OF DEFENDANT CITGO
PETROLEUM CORPORATION'S OBJECTION TO DEFENDANT 7-ELEVEN, INC.'S
MOTION FOR ORDER DETERMINING GOOD FAITH SETTLEMENT**

I, Pamela R. Hanebutt, being duly sworn, do hereby depose and say:

1. I am counsel of record for defendant CITGO Petroleum Corporation in the above-captioned case. I am admitted to practice law in the State of Illinois and am admitted *pro hac vice* in this Court.

2. Attached as Exhibit A is a true and correct copy of CITGO Petroleum Corporation's Answers and Objections to Plaintiff Orange County Water District's Third Set of Interrogatories to Defendants (filed via ECF).

3. Attached as Exhibit B is a true and correct copy of the Amended and Restated Product Purchase Agreement between The Southland Corporation and CITGO Petroleum Corporation dated as of September 30, 1986 and entered into on January 31, 1990 (filed under seal).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 17, 2011 in Chicago, Illinois.



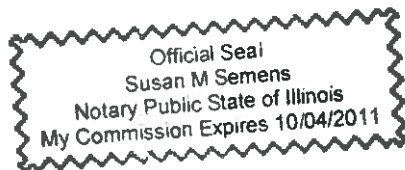
Pamela R. Hanebutt

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Sworn to and subscribed before me on this 17th day of February, 2011.

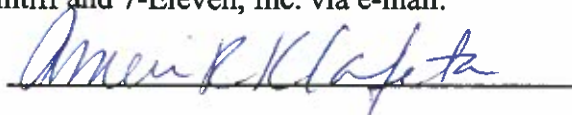


NOTARY PUBLIC



CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on this 17th day of February, 2011, a copy of the foregoing DECLARATION OF PAMELA R. HANE BUTT IN SUPPORT OF DEFENDANT CITGO PETROLEUM CORPORATION'S OBJECTION TO DEFENDANT 7-ELEVEN, INC.'S MOTION FOR ORDER DETERMINING GOOD FAITH SETTLEMENT and Exhibit A to that declaration was served upon all parties of record via LexisNexis File and Serve, and that Exhibit B to the foregoing declaration was served upon counsel for Plaintiff and 7-Eleven, Inc. via e-mail.

A handwritten signature in blue ink, reading "Amey R. Klapeta", is written over a horizontal line.